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Volkswagen Group of America, Inc.
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16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA,**

18 IRIS STRICKLIN, DALER
19 RAKHMET-ZADE, LORI
GOTTLIEB, AMY COCK, SARAH
20 GREENWALD, and MICHELLE
MANNING, individually and on
21 behalf of all others similarly
situated,

22 Plaintiffs,

23 v.
24

25 VOLKSWAGEN GROUP OF
AMERICA, INC., VOLKSWAGEN
OF AMERICA, INC., and
26 VOLKSWAGEN AG,

27 Defendants.
28

Case No. 2:15-cv-07431-DOC-SP

**STIPULATION TO EXTEND TIME
TO RESPOND TO THE COMPLAINT
BY NOT MORE THAN 30 DAYS (L.R.
8-3)**

Complaint Served: Sept. 25, 2015
Current Response Date: Oct. 16, 2015
New response Date: Nov. 16, 2015

1 Pursuant to Local Rule 8-3, Plaintiffs Iris Stricklin, Daler Rakhmet-Zade,
2 Lori Gottlieb, Amy Cock, Sarah Greenwald, and Michelle Manning (“Plaintiffs”)
3 and Defendant Volkswagen Group of America, Inc., (“VWGoA”), also sued herein
4 as Volkswagen of America, Inc., by and through their respective counsel, hereby
5 stipulate as follows:

6 WHEREAS, Local Rule 8-3 provides that parties may extend the deadline to
7 initially respond to a complaint by up to thirty days without a Court Order;

8 WHEREAS, Plaintiff served VWGoA with a Class Action Complaint on
9 September 25, 2015, and absent this extension, VWGoA’s responsive pleading
10 would be due on October 16, 2015; and

11 WHEREAS, a thirty-day extension to the Class Action Complaint falls on
12 Sunday, November 15, 2015, which results in the date for VWGoA’s extended
13 initial response to the Class Action Complaint falling on Monday, November 16,
14 2015. *See* Fed. R. Civ. P. 6(a)(1)(C).

15 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by
16 and between counsel for VWGoA and counsel for Plaintiffs, that:

17 1. VWGoA, also sued herein as Volkswagen of America, Inc., shall have
18 up to and including November 16, 2015 to answer, move, plead or otherwise
19 respond to the Class Action Complaint.

20 2. This Stipulation and Order is not a waiver of any objection or defense
21 that VWGoA or any other party to this action might raise in any subsequent
22 answer, motion, pleading or response to the Class Action Complaint.

23 3. This Stipulation and Order is made without prejudice to the right of
24 any or all parties to seek a further extension of these or any other deadlines for
25 good cause shown.

